

9/6/13
CASE
NO. 2:13-cr-225EXHIBIT
NO. 1

JUSTIFICATION OF SURETY

STATE OF WEST VIRGINIA, }
COUNTY OF LOGAN } To-wit:

I, JOHN A. TURNER, Clerk of the County Commission of said Logan County, do certify that
 MINDY GLICK
 is the owner of real estate in Logan County, the assessed valuation of which, as shown by land
 books for the year 2013 in my said office is as follows:

Description	Value of Land	Value of Building	Total
BLK 10 LOT 7	\$99.00	\$112.620.00	\$122.520.00
MIDELBURG ADDITION			
Total value of land and building	-----	\$122.520.00-----	

Given under my hand this 5th day of September, 20 13.

John A. Turner
 Clerk of the County Commission of Logan County, West Virginia
 by *Delette Clevon* Deputy

STATE OF WEST VIRGINIA, }
COUNTY OF } To-wit:

This day personally appeared before the undersigned who being by me first duly sworn, did depose and say that he is the owner of real estate listed above having an assessed valuation of \$ and the same is free from all encumbrances except.

and that he is not now bound as surety upon any bond or recognizance before any Court of Justice except as follows:

State v. \$

State v. \$

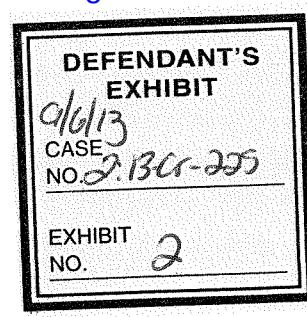
State v. \$

Taken, subscribed and sworn to before me this day of , 20 .

Clerk of Circuit Court, Notary Public, Magistrate
 for County, WV

My commission expires on the day of , 20 .

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON



UNITED STATES OF AMERICA,

v.

Case No. 2:13-cr-225-1

JAMES GREGORY GLICK,

Defendant.

**SUMMARY OF PROSPECTIVE EVIDENCE OFFERED ON
BEHALF OF JAMES GREGORY GLICK**

In support of Mr. Glick's Motion that he be released pending trial, under the provisions of 18 U.S.C. §3142, Mr. Glick, by his counsel submits the following:

1. **Witnesses:** The Defendant has under subpoena and others by voluntary appearance **at least nine witnesses**. Each of these witnesses has known Mr. Glick at least six years and as many as thirty years. These witnesses are familiar with Mr. Glick in his capacity as business owner, as extensively involved in youth sports activities, as donor to charitable causes, most of which was without any particular recognition, as personal friend and as a member of the Glick family. They know him as the father of two children, as coach in baseball, football and basketball leagues, and as a customer in the food-service industry. They know him as boss, and business proprietor.

2. **Family.** Also attending this hearing are Mr. Glick's mother, Mindy Glick of Logan, and Myrtle Beach, his brother, Michael, and his sister Deedee, both of North Carolina. Mrs. Glick is prepared to offer her home in Logan as collateral for her son's release. She will

have with her a justification of surety. The home carries **a tax value of \$122,000**, therefore it is submitted that the value is likely twice that amount and it is unencumbered. Also in attendance is Mrs. Greg Glick (Angel). They are the parents of two children ages 13 and 9.

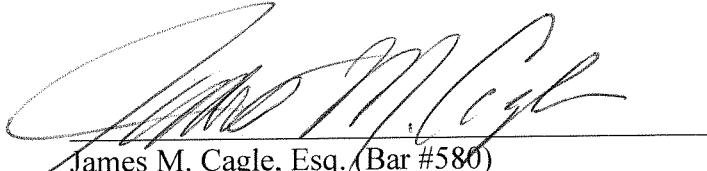
3. **Employment.** Mr. Glick is the owner of a business in the City of Logan. He operates a restaurant known as 317 - The Steak House. He currently employs 11 who work as managers, waitresses, cooks, and dishwasher. The business has a dining area, a bar area, lottery machines and private banquette room. It caters, hosts wedding rehearsals, seasonal parties, and other entertainment gatherings.

4. **Factors.** Counsel is mindful of the factors to be considered and expects to offer evidence which addresses each as identified under Section 3142(g).

5. **Conditions of Release.** The undersigned anticipates offering conditions which will assure both attendance and safety of other persons and community inclusive of the following:

- a. A property bond, if required, in the form of real estate of considerable value and import to the Glick family, ie, Mrs. Glick's home;
- b. Surrender of Mr. Glick's passport;
- c. Restrictions to secure that no contact is made by Mr. Glick of any prospective witness or juror;
- d. Periodic contact with probation department
- e. Travel restriction;
- f. Regular attendance to the business, volunteer activities and communication with counsel;

RESPECTFULLY SUBMITTED,



James M. Cagle, Esq. (Bar #580)
1200 Boulevard Tower
1018 Kanawha Boulevard East
Charleston, WV 25301
(304) 342-3174

CERTIFICATE OF SERVICE

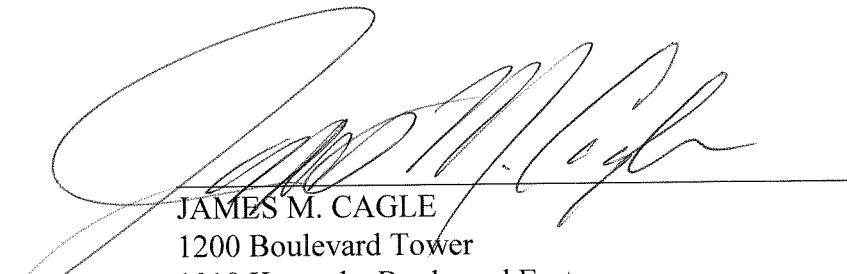
It is hereby certified that service of the foregoing "SUMMARY OF PROSPECTIVE EVIDENCE OFFERED ON BEHALF OF JAMES GREGORY GLICK" has been electronically filed and service has been made on opposing counsel via hand delivery, on this the 6th day of September 2013, to:

Thomas C. Ryan
Assistant United States Attorney
300 Virginia Street East, Rm 4000
Charleston, WV 25301

Philip Sword, Esq.

Brian D. Yost, Esq.

Tim Carrico, Esq.



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UNITED STATES
v.
JAMES GREGORY GLICK,
GUY R. MILLER,
SHAWN C. SIMON AND
JAMEY THOMAS

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9/6/13

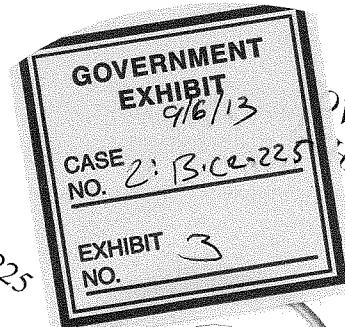


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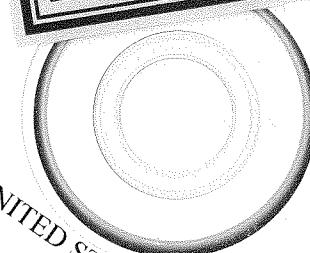
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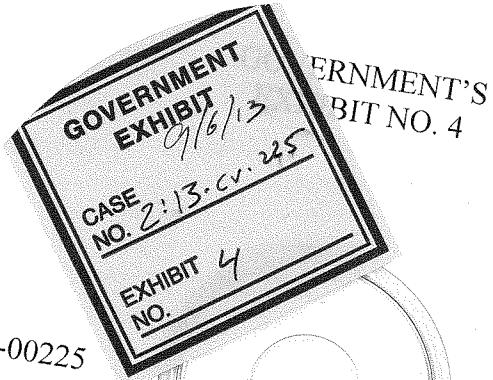
GOVERNMENT'S
EXHIBIT NO. 3



UNITED STATES
v.
JAMES GREGORY GLICK,
GUY R. MILLER, AND
SHAWN C. SIMON AND
JAM JAMEY THOMPSON,

JRJ
09/06/13

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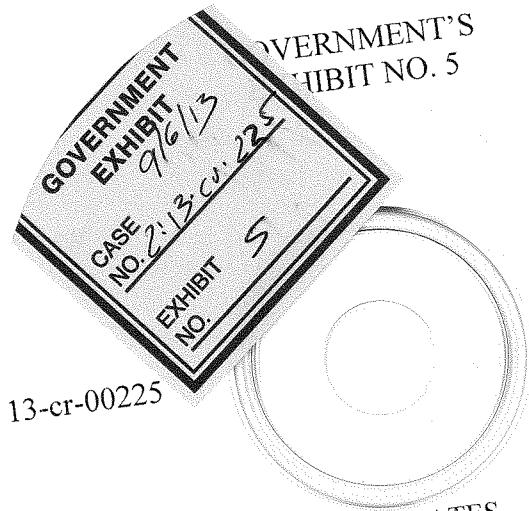
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